

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:

Chapter 13

REELLE K. WITHERSPOON

Debtor

Case No.: 20-12616

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**OBJECTION TO CERTIFICATION OF DEFAULT OF HABITAT FOR HUMANITY**

Debtor-Respondent, Reelle K. Witherspoon (hereafter :Debtor”) objects to the Certification of Default filed by Habitat for Humanity, as follows:

1. Debtor filed a voluntary petition under Chapter 13 on June 12, 2020.
2. On December 24, 2020, Habitat for Humanity filed a Motion for Relief from the Automatic Stay
3. On February 2, 2021, the court entered an Order granting the stipulation between the Debtor and Habitat for Humanity.
4. On December 30, 2021, attorneys for Habitat for Humanity issued a Notice of Default, claiming Debtor had defaulted under the terms of the stipulation.
5. On February 8, 2022, Habitat for Humanity filed a Certification of Default
6. Debtor has sufficient funds to cure any present delinquency in payments pursuant to the terms of the approved stipulation.

WHEREFORE, Debtor respectfully requests an Order denying Habitat for Humanity Relief from the Automatic Stay.

Date: February 8, 2022

BY: /s/ Ashley M. Sullivan  
ASHLEY M. SULLIVAN, EQUIRE  
SPEAR WILDERMAN, P.C.  
230 S. Broad Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
(215) 732-0101  
(215) 7342-7790 (fax)  
[asullivan@spearwilderman.com](mailto:asullivan@spearwilderman.com)  
Attorney for Debtor